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RICHARD W. NAGEL
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

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U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
EAST DIV. COLUMBUS

UNITED STATES OF AMERICA,

Plaintiff,

v.

DESHAWN LEWIS (1)
aka Crippy, aka Cripface

MARIO SYDNOR, SR. (2)
aka Rio, aka Big Rio

MARIO SYDNOR, JR. (3)
aka Lil' Rio

MARQUIS ANDERSON (4)
aka Dot

ROBERT JACKSON (5)

Defendants.

CASE NO. 2:21-CR-255

JUDGE MICHAEL H. WATSON

SUPERSEDING INDICTMENT

21 U.S.C. § 841(a)(1)

21 U.S.C. § 841(b)(1)(B)(iii)

21 U.S.C. § 841(b)(1)(B)(vi)

21 U.S.C. § 841(b)(1)(C)

21 U.S.C. § 846

18 U.S.C. §§ 922(g)(1) & 924(a)

18 U.S.C. § 924(c)(1)(A)(i)

18 U.S.C. § 2

FORFEITURE ALLEGATIONS

THE GRAND JURY CHARGES:

COUNT 1

(Conspiracy to Possess with Intent to Distribute Controlled Substances)

1. Beginning in or around 2021, and continuing until the date of this Superseding Indictment, the exact dates being unknown, in the Southern District of Ohio and elsewhere, Defendants **DESHAWN LEWIS, aka Crippy, aka Cripface, MARIO SYDNOR, SR., aka Rio, aka Big Rio, MARIO SYDNOR, JR., aka Lil' Rio, MARQUIS ANDERSON, aka Dot, and ROBERT JACKSON**, knowingly and intentionally combined, conspired, and agreed, with each other and others known and unknown to the Grand Jury, to possess with intent to distribute and to distribute controlled substances, including:

- a. 28 grams or more of a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance;
- b. 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide, commonly referred to as fentanyl, a Schedule II controlled substance;
- c. a mixture or substance containing a detectable amount of oxycodone, a Schedule II controlled substance; and
- d. a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance,

in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(iii), 841(b)(1)(B)(vi), and 841(b)(1)(C).

In violation of 21 U.S.C § 846.

COUNT 2

(Possession with Intent to Distribute Controlled Substances)

2. On or about February 11, 2021, in the Southern District of Ohio, Defendants **DESHAWN LEWIS** and **MARQUIS ANDERSON** did knowingly and intentionally possess with the intent to distribute:

- a. a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance; and
- b. a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide, commonly referred to as fentanyl, a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C) and 18 U.S.C. § 2.

COUNT 3

(Possession with Intent to Distribute Controlled Substances)

3. On or about July 1, 2021, in the Southern District of Ohio, Defendants **DESHAWN LEWIS** and **MARIO SYDNOR, JR.** did knowingly and intentionally possess with the intent to distribute:

- a. a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance; and
- b. a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide, commonly referred to as fentanyl, a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C) and 18 U.S.C. § 2.

COUNT 4

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)

4. On or about July 1, 2021, in the Southern District of Ohio, Defendant **MARIO SYDNOR, JR.** did knowingly possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, as set forth in Count Three of this Indictment, which is fully incorporated herein by reference.

In violation of 18 U.S.C. § 924(c)(1)(A)(i).

COUNT 5

(Possession with Intent to Distribute Controlled Substances)

5. On or about October 21, 2021, in the Southern District of Ohio, Defendant **DESHAWN LEWIS** did knowingly and intentionally possess with the intent to distribute:

- a. a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance; and
- b. a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide, commonly referred to as fentanyl, a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C) and 18 U.S.C. § 2.

COUNT 6

(Possession with Intent to Distribute Controlled Substances)

6. On or about November 22, 2021, in the Southern District of Ohio, Defendants

DESHAWN LEWIS and **ROBERT JACKSON** did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of oxycodone, a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C) and 18 U.S.C. § 2.

COUNT 7

(Possession with Intent to Distribute Controlled Substances)

7. On or about December 9, 2021, in the Southern District of Ohio, Defendants **DESHAWN LEWIS** and **MARIO SYDNOR, SR.** did knowingly and intentionally possess with the intent to distribute:

- a. a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance; and
- b. a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide, commonly referred to as fentanyl, a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C) and 18 U.S.C. § 2.

COUNT 8

(Possession with Intent to Distribute Controlled Substances)

8. On or about December 9, 2021, in the Southern District of Ohio, Defendants **DESHAWN LEWIS** and **MARQUIS ANDERSON** did knowingly and intentionally possess with the intent to distribute:

- a. a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance; and
- b. a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C) and 18 U.S.C. § 2.

COUNT 9

(Prohibited Person in Possession of a Firearm)

9. On or about December 9, 2021, in the Southern District of Ohio, Defendant **MARQUIS ANDERSON**, knowing that he had been convicted of one or more crimes punishable by imprisonment for a term exceeding one year, did knowingly possess one or more firearms, to wit: one Sig Sauer P290RS, 9mm pistol, bearing serial number 26C069710, and one Glock GMBH 17, 9mm caliber pistol, bearing serial number BRWE315, said firearms having been shipped and transported in interstate or foreign commerce.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a).

COUNT 10

(Prohibited Person in Possession of a Firearm)

10. On or about December 9, 2021, in the Southern District of Ohio, Defendant **DESHAWN LEWIS**, knowing that he had been convicted of one or more crimes punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, to wit: one Glock, Model 19, 9mm pistol, bearing serial number BFNC511, said firearm having been shipped and transported in interstate or foreign commerce.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a).

COUNT 11

(Prohibited Person in Possession of a Firearm)

11. On or about December 9, 2021, in the Southern District of Ohio, Defendant **MARIO SYDNOR, SR.**, knowing that he had been convicted of one or more crimes punishable by imprisonment for a term exceeding one year, did knowingly possess one or more firearms, to wit: one FNH, Model 509, 9mm pistol, bearing serial number GKS0106580, and one Taurus International Spectrum, .380 caliber pistol, bearing serial number 1F162396, said firearms having

been shipped and transported in interstate or foreign commerce.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a).

FORFEITURE ALLEGATION A

12. The allegations of this Superseding Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America.

13. Upon conviction of any offense in violation of 21 U.S.C. § 841 and/or 21 U.S.C. § 846 as alleged in this Superseding Indictment against Defendant **DESHAWN LEWIS, aka Crippy, aka Cripface**, the defendant shall forfeit to the United States, in accordance with 21 U.S.C. § 853(a)(1) and (2), all right, title and interest in any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violations, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violations, including, but not limited to:

- a. Approximately \$480.00 in United State currency seized on or about October 21, 2021, during the search of 214 South Yale Avenue, Columbus, Ohio; and
- b. The following property seized on or about December 9, 2021, during the search of 2586 Osceola Avenue, Columbus, Ohio:
 - \$19,413.00 U.S. Currency
 - Approximately 13 rounds of Federal 9mm ammunition;
 - A Glock GMBH 19GEN4, 9mm pistol, bearing Serial Number BFNC511;
 - Approximately 1 round of 9mm ammunition; and
 - The following jewelry:
 - a. A 22-inch 10 karat white and yellow gold diamond link chain hosting a combined total diamond weight of 1/2 carats, along with a 10 karat yellow gold and diamond letter "C" pendant. The pendant hosts approximately 149 full cut diamonds and an approximate total weight of 2 5/8 carats;

- b. A pair of 14 karat yellow gold diamond stud earrings with a combined total weight of 4.02 carats;
- c. A man's custom 10 karat yellow gold diamond ring. Approximately 1,093 diamonds embellish the ring. The top of the ring hosts the letters "C F". On the back of the ring, the word "CRIPPY" is built into the shank. The approximate total diamond weight is 26 1/3 carats; and
- d. A set of tooth guards constructed of 10 karat yellow gold. On the front sides of the forms there are approximately 331 diamonds. The approximate total weight of diamonds is 5 carats.

Forfeiture pursuant to 21 U.S.C. § 853(a)(1) and (2) and Rule 32.2 of the Federal Rules of Criminal Procedure.

FORFEITURE ALLEGATION B

14. The allegations of this Superseding Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America.

15. Upon conviction of any offense alleged in this Superseding Indictment against Defendant **DESHAWN LEWIS, aka Crippy, aka Cripface**, the defendant shall forfeit to the United States, in accordance with 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), all firearms and ammunition involved in or used in such offense, including, but not limited to the following firearms and ammunition seized on or about December 9, 2021, during the search of 2586 Osceola Avenue, Columbus, Ohio:

- Approximately 13 rounds of Federal 9mm ammunition;
- A Glock GMBH 19GEN4, 9mm pistol, bearing Serial Number BFNC511; and
- Approximately 1 round of 9mm ammunition.

Forfeiture in accordance with 18 U.S.C. § 924(d)(1), 28 U.S.C. § 2461(c), and Rule 32.2 of the Federal Rules of Criminal Procedure.

FORFEITURE ALLEGATION C

16. The allegations of this Superseding Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America.

17. Upon conviction of any offense in violation of 21 U.S.C. § 841 and/or 21 U.S.C. § 846 as alleged in this Superseding Indictment against Defendant **MARIO SYDNOR, SR., aka Rio, aka Big Rio**, the defendant shall forfeit to the United States, in accordance with 21 U.S.C. § 853(a)(1) and (2), all right, title and interest in any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violations, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violations, including, but not limited to:

- a. The following property seized on or about December 9, 2021, during the search of 808 Gascony Drive, Reynoldsburg, Ohio:
 - An FNH USA, LLC 509, 9mm pistol, bearing Serial Number GKS0106580;
 - A Taurus International Spectrum .380 caliber pistol, bearing Serial Number 1F162396;
 - Approximately 13 rounds of 9mm ammunition;
 - Approximately 5 rounds of .380cal ammunition;
 - Approximately \$82,758.00 in United States currency;
 - A pair of Cartier sunglasses embellished with 14 karat gold plates which feature approximately 91 bed-set diamonds and an approximate total weight of diamonds of 11 1/3 carats. Model Number CT00920, C Décor gold style featuring brown tinted square frameless lenses;
 - A pair of Cartier sunglasses embellished with 14 karat gold plates which feature approximately 62 bed-set diamonds and an approximate total weight of diamonds of 2 1/5 carats. Model Number Co4A81M (CT0012RS), gold with brow wood temples style featuring black tinted square frameless lenses;
 - A Gucci brand, GG Supreme Canvas small messenger bag, Serial Number 523599 498879; and
 - A Gucci brand, GG Supreme Canvas “Neo Vintage” belt bag, Serial Number 493930 498879.
- b. The following property seized on or about December 9, 2021, during the

search of 307 North Taylor Avenue, Unit A, Columbus, Ohio:

- Approximately 21 rounds of Federal .45caliber ammunition;
- Approximately 11 rounds of Tula Cartridge Works - Russia 9mm ammunition;
- Approximately 1 round of .357 caliber ammunition; and
- Approximately 50 rounds of CCI 9mm ammunition.

Forfeiture pursuant to 21 U.S.C. § 853(a)(1) and (2) and Rule 32.2 of the Federal Rules of Criminal Procedure.

FORFEITURE ALLEGATION D

18. The allegations of this Superseding Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America.

19. Upon conviction of any offense alleged in this Superseding Indictment against Defendant **MARIO SYDNOR, SR., aka Rio, aka Big Rio**, the defendant shall forfeit to the United States, in accordance with 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), all firearms and ammunition involved in or used in such offense, including, but not limited to:

- a. The following property seized on or about December 9, 2021, during the search of 808 Gascony Drive, Reynoldsburg, Ohio:
 - An FNH USA, LLC 509, 9mm pistol, bearing Serial Number GKS0106580;
 - A Taurus International Spectrum .380 caliber pistol, bearing Serial Number 1F162396;
 - Approximately 13 rounds of 9mm ammunition;
 - Approximately 5 rounds of .380cal ammunition;
- b. The following property seized on or about December 9, 2021, during the search of 307 North Taylor Avenue, Unit A, Columbus, Ohio:
 - Approximately 21 rounds of Federal .45caliber ammunition;
 - Approximately 11 rounds of Tula Cartridge Works - Russia 9mm ammunition;
 - Approximately 1 round of .357 caliber ammunition; and
 - Approximately 50 rounds of CCI 9mm ammunition.

Forfeiture in accordance with 18 U.S.C. § 924(d)(1), 28 U.S.C. § 2461(c), and Rule 32.2 of the Federal Rules of Criminal Procedure.

FORFEITURE ALLEGATION E

20. The allegations of this Superseding Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America.

21. Upon conviction of any offense in violation of 21 U.S.C. § 841 and/or 21 U.S.C. § 846 as alleged in this Superseding Indictment against Defendant **MARIO SYDNOR, JR., aka Lil' Rio**, the defendant shall forfeit to the United States, in accordance with 21 U.S.C. § 853(a)(1) and (2), all right, title and interest in any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violation, including, but not limited to, the following property seized on or about July 1, 2021, during the search of 430 South Central Avenue, Columbus, Ohio:

- A Glock 23, .40 caliber firearm, bearing Serial Number FHH883;
- Approximately 13 rounds of .40 caliber ammunition;
- A box of 9mm ammunition; and
- Approximately \$929.00 in United States currency.

Forfeiture pursuant to 21 U.S.C. § 853(a)(1) and (2) and Rule 32.2 of the Federal Rules of Criminal Procedure.

FORFEITURE ALLEGATION F

22. The allegations of this Superseding Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America.

23. Upon conviction of any offense alleged in this Superseding Indictment against Defendant **MARIO SYDNOR, JR., aka Lil' Rio**, the defendant shall forfeit to the United States, in accordance with 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), all firearms and ammunition involved in or used in such offense, including, but not limited to the following firearms and ammunition seized on or about July 1, 2021, during the search of 430 South Central Avenue,

Columbus, Ohio :

- Glock 23, .40 caliber pistol, bearing Serial Number FHH883;
- Approximately 13 rounds of .40 caliber ammunition; and
- A box of 9mm ammunition.

Forfeiture in accordance with 18 U.S.C. § 924(d)(1), 28 U.S.C. § 2461(c), and Rule 32.2 of the Federal Rules of Criminal Procedure.

FORFEITURE ALLEGATION G

24. The allegations of this Superseding Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America.

25. Upon conviction of any offense in violation of 21 U.S.C. § 841 and/or 21 U.S.C. § 846 as alleged in this Superseding Indictment against Defendant **MARQUIS ANDERSON, aka Dot**, the defendant shall forfeit to the United States, in accordance with 21 U.S.C. § 853(a)(1) and (2), all right, title and interest in any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violation, including, but not limited to, the following::

- a. Approximately \$968.00 in United State currency seized on or about February 11, 2021, during the search of 203 Avondale Avenue, Columbus, Ohio; and
- b. The following property seized on or about December 9, 2021, during the search of 920 Caldwell Place, Columbus, Ohio:
 - A Sig-Sauer P290RS, 9mm pistol, bearing Serial Number 26C069710;
 - A Glock GMBH 17, 9mm pistol, bearing Serial Number BRWE315;
 - Approximately 16 rounds of Western Cartridge 9mm ammunition; and
 - Approximately 52 rounds of assorted 9mm ammunition.

Forfeiture pursuant to 21 U.S.C. § 853(a)(1) and (2) and Rule 32.2 of the Federal Rules of Criminal Procedure.

FORFEITURE ALLEGATION H

26. The allegations of this Superseding Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America.

27. Upon conviction of any offense alleged in this Superseding Indictment against Defendant **MARQUIS ANDERSON, aka Dot**, the defendant shall forfeit to the United States, in accordance with 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), all firearms and ammunition involved in or used in such offense, including, but not limited to the following firearms and ammunition seized on or about December 9, 2021, during the search of 920 Caldwell Place, Columbus, Ohio:

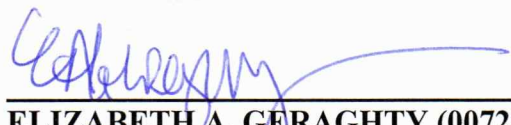
- A Sig-Sauer P290RS, 9mm pistol, bearing Serial Number 26C069710;
- A Glock GMBH 17, 9mm pistol, bearing Serial Number BRWE315;
- Approximately 16 rounds of Western Cartridge 9mm ammunition; and
- Approximately 52 rounds of assorted 9mm ammunition.

Forfeiture in accordance with 18 U.S.C. § 924(d)(1), 28 U.S.C. § 2461(c), and Rule 32.2 of the Federal Rules of Criminal Procedure.

A True Bill.

s/ Foreperson
GRAND JURY FOREPERSON

KENNETH L. PARKER
UNITED STATES ATTORNEY


ELIZABETH A. GERAGHTY (0072275)
Assistant United States Attorney